

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:  Francis G. Piller,  Debtor,  Deutsche Bank National Trust Company, as trustee, on behalf of the holders of the Impac Secured Assets Corp. Mortgage Pass-Through Certificates Series 2007-3,  Movant,  v.  Francis G. Piller,  Debtor,  Kenneth E. West, Trustee/Respondent.	Bankruptcy No. 25-11771-djb  Chapter 13  Related to Doc. No. 18
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**DEUTSCHE BANK NATIONAL TRUST COMPANY’S OBJECTION TO  
CONFIRMATION OF  
DEBTOR’S CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as trustee, on behalf of the holders of the IMPAC Secured Assets Corp. Mortgage Pass-Through Certificates Series 2007-3, (“DEUTSCHE BANK”), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtor, Francis G. Piller, and in support thereof alleges as follows:

1. Debtor, Francis G. Piller, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on May 5, 2025.

2. DEUTSCHE BANK holds a security interest in the Debtor's real property located 3217 Winter Street, Philadelphia, PA 19104 (the "Property"), by virtue of a Mortgage recorded with the Philadelphia County Recorder of Deeds on April 4, 2007 in instrument No. 51664409 which has ultimately been assigned to Deutsche Bank National Trust Company, as trustee, on behalf of the holders of the IMPAC Secured Assets Corp. Mortgage Pass-Through Certificates Series 2007-3.
3. Said Mortgage secures a Note in the amount of \$292,000.00
4. Upon review of internal records, it is anticipated that DEUTSCHE BANK Proof of Claim will include a pre-petition arrearage of approximately \$86,901.21 a true and correct copy of the pre-petition arrearage is attached hereto as Exhibit "A."
5. On June 16, 2025, Debtor filed a Chapter 13 Plan (the "Plan") A true and correct copy of the Plan is attached hereto as Exhibit "B."
6. The Plan fails to account for the full pre-petition arrearage of \$86,901.21 as it only provides \$74,252.00 that will be paid to Secured Creditor through the Plan. See Exhibit "B."
7. Thus, the Plan is understated as it does not accurately reflect the amount of the pre-petition arrearage which will be paid through the Chapter 13 Trustee's Office.
8. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) DEUTSCHE BANK hereby objects to Debtor's proposed Plan due to the fact that the value of the property to be distributed thereunder will be less than the allowed amount under the claim. See 11 U.S.C.A. § 1325(a)(5)(B)(ii).

**WHEREFORE**, Secured creditor Deutsche Bank National Trust Company, as trustee, on behalf of the holders of the IMPAC Secured Assets Corp. Mortgage Pass-Through Certificates Series 2007-3, respectfully requests that this Court not confirm the Chapter 13 Plan of Debtor, Francis G. Piller.

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**

Authorized Agent for Secured Creditor  
13010 Morris Rd., Suite 450  
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By: /s/Robert Shearer  
Robert Shearer, Esquire  
Pennsylvania Bar Number 83745  
Email: rshearer@raslg.com

Date: June 25, 2025

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In re:  Francis G. Piller,  Debtor,  U.S. Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For RCAF Acquisition Trust,  Movant,  v.  Francis G. Piller,  Debtor,  Kenneth E. West, Trustee/Respondent.	Bankruptcy No. 25-11771-djb  Chapter 13  Related to Doc. No. 18
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 25, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Michael A. Cibik  
Cibik Law, P.C.  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102

Kenneth E. West  
Office of the Chapter 13 Standing Trustee  
190 N. Independence Mall West  
Suite 701

Philadelphia, PA 19106

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia, PA 19107

Francis G. Piller  
4334 1/2 Boone Street  
Philadelphia, PA 19128-4901

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

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